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*Attorneys for Plaintiff Millrock Investment Fund 1, LLC*

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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MILLROCK INVESTMENT FUND 1, LLC,

Plaintiff,

v.

HEALTHCARE SOLUTIONS  
MANAGEMENT GROUP, INC.;  
HEALTHCARE SOLUTIONS HOLDINGS  
INC.; LANDES CAPITAL MANAGEMENT,  
LLC; LANDES AND COMPAGNIE TRUST  
PRIVE KB; JOSHUA CONSTANTIN;  
JUSTIN SMITH; STUART MCMAHEN; and  
BLACK LABEL SERVICES, INC.,

Defendants.

**STIPULATED MOTION FOR AN ORDER  
AMENDING SCHEDULING ORDER AND  
SETTING BRIEFING DEADLINES FOR  
PENDING MOTIONS**

Case No. 2:23-CV-00157-RJS-DAO

Chief District Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

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Pursuant to the Court's June 24, 2024 Docket Text Order (Doc. No. 114), Plaintiff Millrock Investment Fund 1, LLC and Defendants Joshua Constantin and Stuart McMahan, by and through their counsel of record, and Defendant Justin Smith, appearing pro se, file this Stipulated Motion

and hereby jointly move the Court to enter the attached (as Exhibit “A”) Order Amending Scheduling Order and Setting Briefing Deadlines for Pending Motions (the “Proposed Order”). Good cause exists for entry of the Proposed Order in light of the dismissal of Healthcare Solutions Management Group, Inc.’s bankruptcy, and because the stay of this case has been lifted.

DATED this 8<sup>th</sup> day of July, 2024.

**PARR BROWN GEE & LOVELESS**

By: /s/ Bentley J. Tolk  
Terry E. Welch  
Bentley J. Tolk  
Rodger M. Burge

*Attorneys for Plaintiff Millrock Investment Fund 1, LLC*

**CLYDE SNOW & SESSIONS**

By: /s/ Keith M. Woodwell\*  
Keith M. Woodwell  
Thomas A. Brady  
Nickolas C. Sessions

*Attorneys for Defendants Joshua Constantin and Stuart McMahan*

\*Signed by counsel with permission via email

**JUSTIN SMITH**

/s/ Justin Smith\*  
Justin Smith

\*Signed by counsel with permission via email

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2024, I caused to be served a true and correct copy of the foregoing **STIPULATED MOTION FOR AN ORDER AMENDING SCHEDULING ORDER AND SETTING BRIEFING DEADLINES FOR PENDING MOTIONS** via the CM/ECF system on the following:

Keith M. Woodwell  
Thomas A. Brady  
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/s/ Bentley J. Tolk